



January 18, 2022

Breeze Aviation Group, Inc.
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U.S Department of Transportation
Docket Management System
West Building Ground Floor, Room W12-140
1200 New Jersey Avenue, SE
Washington, DC 20590

To Whom it May Concern,

In accordance with the Code of Federal Regulations 14 CFR 11.61, Breeze Airways hereby petitions the Administrator for exemption No. 10102, as amended. This exemption provides relief from 14 CFR 121.434(c)(1)(ii) by permitting Breeze Airways to substitute a qualified and authorized check pilot and/or aircrew program designee for an FAA inspector to observe a qualifying pilot in command (PIC) who is completing initial, or upgrade training specified in 14 CFR 121.424, during at least one flight leg that includes a takeoff and landing, subject to the following conditions and limitations.

1. A Breeze Airways check pilot and/or aircrew program designee would conduct a PIC observation in place of an FAA inspector when:
 - a. The Administrator preapproves that substitution for each observation of a qualifying PIC candidate, thus reserving first right of refusal to the FAA in each case. Breeze Airways, therefore, must contact an appropriate FAA office, in each instance, before substituting that check pilot and/or aircrew program designee.
 - b. The qualifying PIC candidate has completed no fewer than 10 hours of supervised operating experience (OE) and has accomplished no fewer than two takeoffs and landings; and
 - c. The qualifying PIC candidate is performing PIC duties during a complete flight leg, including flight deck preparation, before starting engines checklist, taxi, takeoff, all other flight phases, landing, taxi, and securing checklist.
2. Each Breeze Airways check pilot and/or aircrew program designee conducting a PIC observation in place of an FAA inspector must:
 - a. Be approved by the Administrator to conduct the observation.
 - b. Have served as a check pilot and/or aircrew program designee for Breeze Airways for no less than 6 months; and
 - c. Have not supervised OE or have conducted the line check for the qualifying PIC candidate being observed.



Breeze Airways anticipates rapid growth and, as such, substantial numbers of new PIC candidates completing training.

3. Therefore, Exemption 10102 would:
 - a. Allow the FAA greater flexibility and better use of its very limited inspector force by focusing on higher priority safety functions. The local Garden City CMO has a limited number of inspectors to support the level of operations. Furthermore, support from geographic inspectors to assist with these observations has been extremely limited. As a result, we now have a substantial backlog of observations.
 - b. Allow Breeze the use of qualified pilots immediately after completing operating experience.
 - c. Allow Breeze Airways the ability to more quickly use newly qualified PICs to provide dependable, on-time air service to the public.
 - d. Allow the traveling public greater access to Breeze Airways' service offerings at a pace consistent with its planned expansion of operations.
 - e. Allow full utilization of Breeze Airways' fleet by ensuring adequate pilot staffing to provide increased service to previously underserved markets.
4. Grant of this requested relief to Breeze Airways will not reduce the level of safety provided by the applicable regulation, at 14 CFR 121.434(c)(1)(ii), given that:
 - a. The authorized check pilots and/or aircrew program designees will be highly trained and experienced with the specific aircraft type and will be approved by the FAA.
 - b. The check pilots and/or aircrew program designees will only be used to fulfill 14 CFR 121.434(c)(1)(ii) when a qualified FAA inspector is not available; and
 - c. The FAA maintains the authority to observe any pilot at any time during line observations.

Therefore, for the foregoing reasons, Breeze Airways respectfully requests that Exemption No. 10102, providing relief from 121.434(c)(1)(ii), be granted.

Sincerely,

Christopher R. Owens

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